

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION

KENYON RAHEEN GADSDEN,  
Petitioner,

-vs-

JOHN FANELLO,  
Warden, USP Allenwood,  
Respondent.

1: CV- 01-1122

\* Crim Nos.96-CR-182

\* From the District Court  
For the Eastern District  
of Virginia

FILED  
HARRISBURG

JUN 22 2001

\* \* \* \* \*  
MOTION FOR APPEARANCE PRO HAC VICE

MARY E. D'ANDREA, CLERK  
Per 9/8  
DEPUTY CLERK

COMES NOW, Robert A. Ratliff, counsel for the Petitioner, Kenyon Gadsden, and hereby requests that he be granted special or limited appearance as counsel in the above referenced case and that the normal requirement of local counsel designation be waived. In support thereof, counsel for the Petitioner states as follows.

1. Kenyon Gadsden has retained attorney, Rob Ratliff to serve as counsel for the limited purpose of filing a post-conviction motion pursuant to the provisions of Title 28 U.S.C. § 2241, in the United States District Court for the Middle District of Pennsylvania.
2. Mr. Ratliff is a practicing attorney and duly admitted to the Bar of the State of Ohio on November 11, 1997 and admitted to practice before the Sixth Circuit Court of Appeals. Additionally, Mr. Ratliff is admitted to practice

before the Court of Appeals for the Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleventh Circuits. As well as the District Court for the Eastern District of Wisconsin, the District of Colorado and the District Courts for the Northern and Southern District of Ohio. Mr. Ratliff would attest that he is a member in good standing of all listed.

3. Counsel would submit that the Petitioner is incarcerated and has available limited funds in order to retain local counsel.

Wherefore, in view of the foregoing, counsel requests that this motion for leave to appear Pro Hac Vice and waiver of local counsel be granted.

Respectfully Submitted,

By:

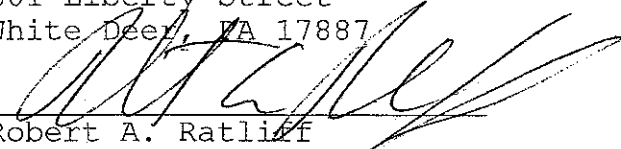
Robert A. Ratliff  
Attorney for Petitioner  
11331 Grooms Road, Suite 2000  
Cincinnati, Ohio 45242  
(513) 469-7444

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion and Memorandum of Law appended hereto has been sent this 21 day of June, 2001, by regular U.S. Mail with sufficient postage affixed thereto to insure delivery thereof to:

David Barasch  
Assistant U.S. Attorney  
Federal Building  
228 Walnut Street  
Harrisburg, PA 17108

John Fanello  
Warden  
USP Allenwood  
601 Liberty Street  
White Deer, PA 17887

  
Robert A. Ratliff  
Attorney for Petitioner  
11331 Grooms Road, Suite 2000  
Cincinnati, Ohio 45242  
(513) 469-7444